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June 16, 1995

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JUN 16 1995

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Re: CC Docket <sup>92-237</sup> 91-237; IAD File No. 94-101  
ORAL EX PARTE PRESENTATION

Dear Mr. Caton:

I am writing this letter to report that on this date Mr. Alexander Netchvolodoff of Cox Enterprises, Inc. ("Cox") and the undersigned, representing Cox, met with Marian Gordon, Michael Specht and Staci Williams of the Domestic Facilities Division of the Common Carrier Bureau regarding the above-referenced matters. During that meeting, we discussed issues described in Cox's comments in those proceedings and issues addressed by the attached materials, which were provided to the FCC staff members attending the meeting.

In accordance with the requirements Section 1.1206(a) of the Commission's Rules, an original and one copy of this letter are being submitted to the Secretary's office and copies of this letter are being provided to Ms. Gordon, Mr. Specht and Ms. Williams.

Respectfully submitted,



J.G. Harrington

JGH/taf  
Attachment

cc (w/attach.): Ms. Marian Gordon  
Mr. Michael Specht  
Ms. Staci Williams

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## **CURRENT STATUS OF N11 SERVICE**

- **Where N11 Service Is Available, Public Response Has Been Overwhelmingly Positive**

Cox's experience in providing information services via N11 numbers continues to be extremely good. Cox's services in both Florida and Georgia have shown steady growth, with almost no customer complaints. These experiences stand in sharp contrast to the experience of 900 and 976 services. (Charts showing call volume in both states are attached.)

- **N11 Service Meets the Needs of Local Information Services Providers**

N11 service is now available in five states in the BellSouth region and 41 N11 numbers have been activated as of May 1. Although N11 service has far exceeded Southern Bell's original projections, there still are numbers available in all markets where the service is offered. These figures demonstrate that N11 meets a specific need for convenient local access to inexpensive information services. At the same time, they also show that demand for N11 service is not likely to exceed the available supply of N11 numbers.

- **Telephone Companies Still Resist Providing N11 Service**

Since the initiation of the N11 proceeding, only one other telephone company has joined BellSouth in agreeing to offer N11 service. This company, United, has agreed to provide the service in only one area, Florida, where BellSouth already provides N11 service and where United can use the service in conjunction with its own Yellow Pages operation.

- **No Evidence Supports Assigning N11 Numbers for "Public Interest" Uses**

Since the time the Commission requested comments on "public interest" uses of N11 numbers, there has been no new evidence to support those uses, and the technical and economic roadblocks to those uses remain in place. In fact, the Industry Numbering Committee, at its January meeting, decided that N11 numbers should not be assigned for access to telecommunications relay service because using N11 numbers would raise significant technical and economic issues. (The committee decided to assign 800 numbers instead.) Similarly, neither of the two states where N11 numbers were set aside for state government use has put those numbers in service and neither state government has been able to articulate any plan for implementation.

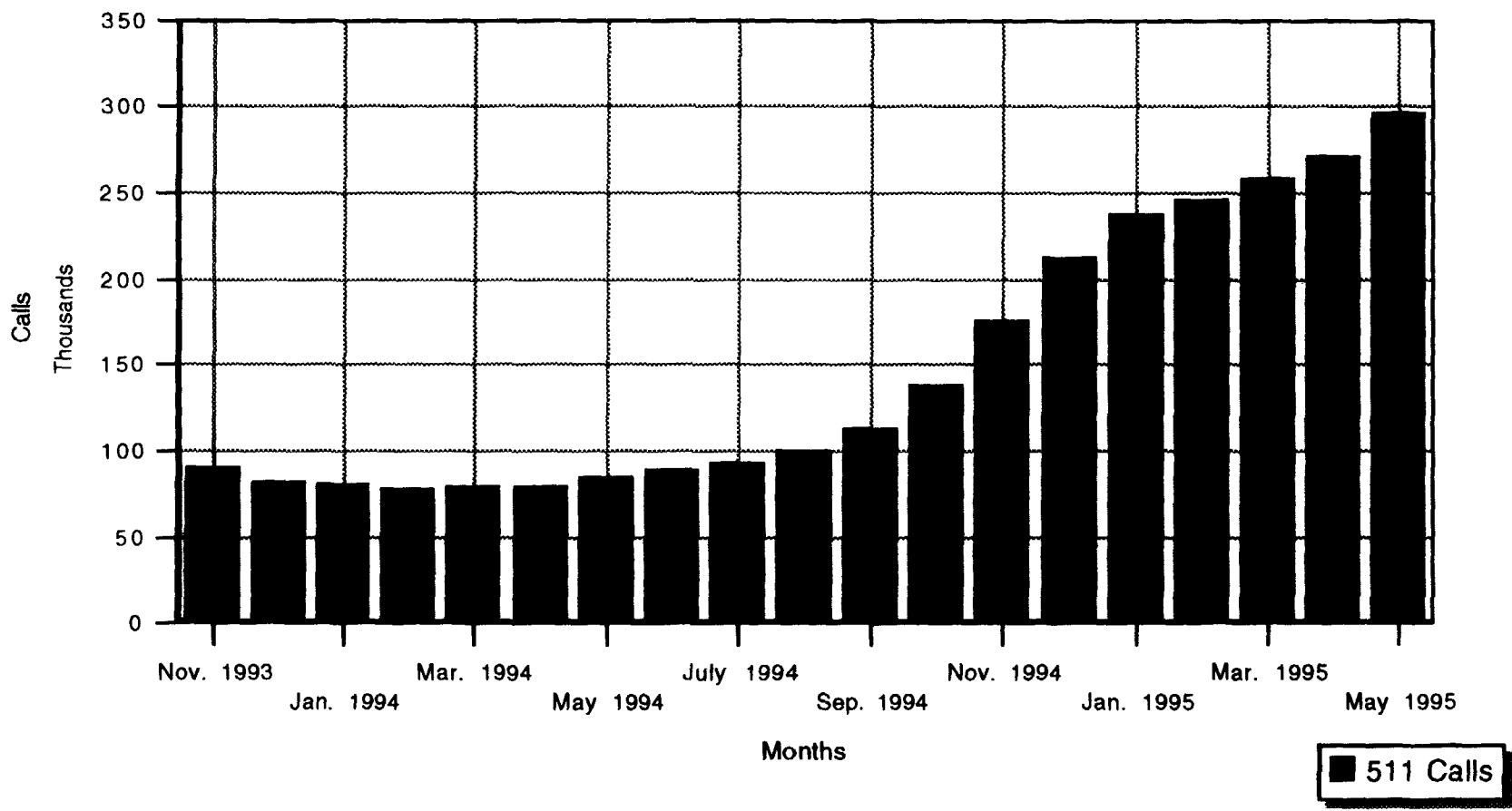
- **Alternative Abbreviated Dialing Arrangements Are Still Years Away**

Despite some progress in industry forums, alternative abbreviated dialing arrangements are still far in the future. The Information Industry Liaison Committee has found certain abbreviated dialing arrangements to be feasible and has recommended their use, but those recommendations were only the first step. The Industry Numbering Committee is now considering whether and how to assign abbreviated dialing numbering resources. Once the Industry Numbering Committee reaches a decision, it is possible that the Industry Carriers Compatibility Forum or another industry forum will have to consider additional technical issues (as was the case for 555 service). Only then will carriers begin to implement the service. Absent a regulatory jump start, this process could take years to complete.

# 511 Call Volume

Atlanta, Georgia

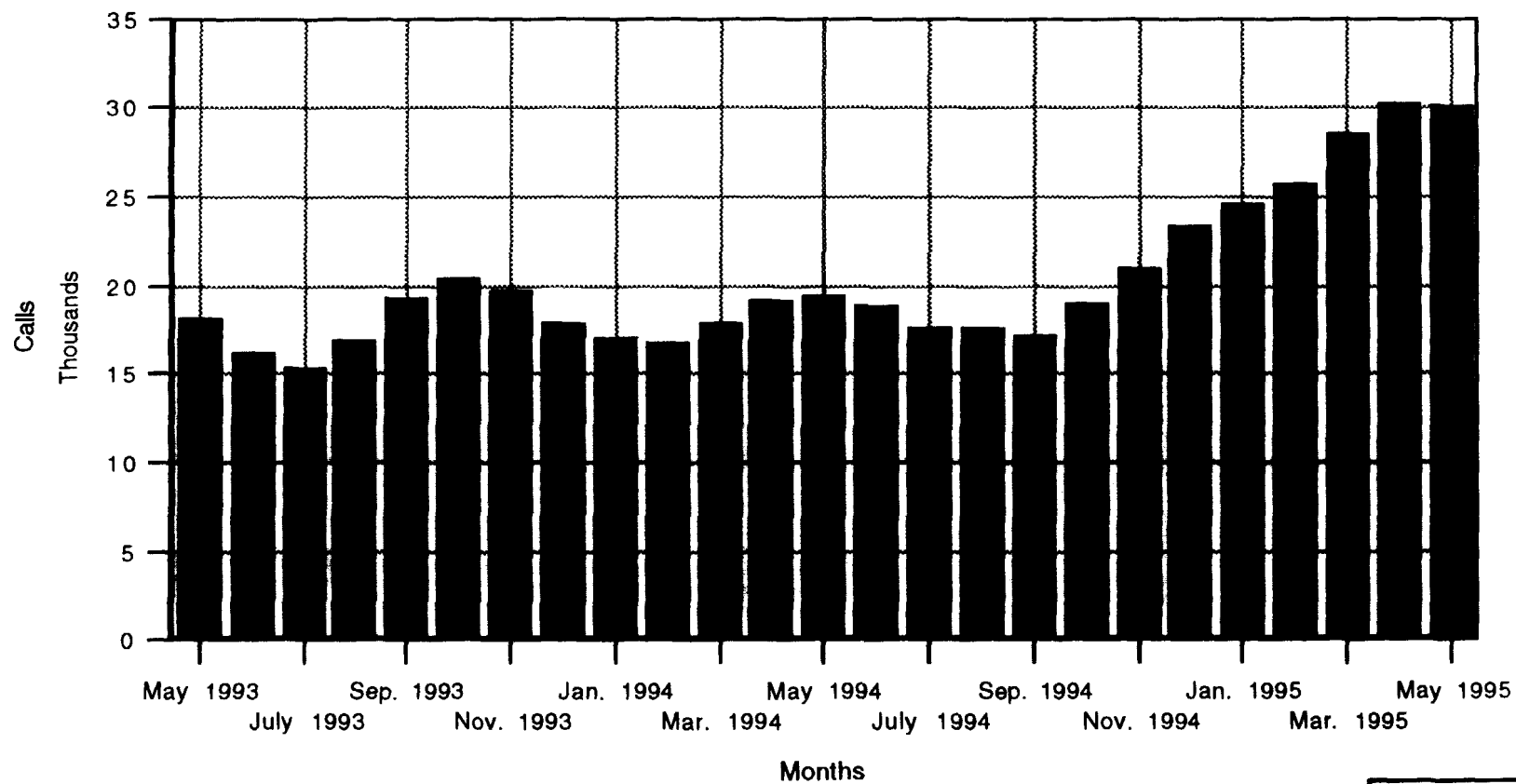
3-Month Moving Averages  
September 1993 to May 1995



# 511 Call Volume

West Palm Beach, Florida

3-Month Moving Averages  
March 1993 to May 1995



■ 511 Calls